

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

STEVEN G. MILLETT, MELODY J. MILLETT,
On Behalf of Themselves and All Others
Similarly Situated,

Plaintiffs,

v.

TRUELINK, INC.,
A Trans Union Company,

Defendant.

Case No. 05-599-SLR

AFFIDAVIT OF PLAINTIFF MELODY MILLETT

I, Melody Millett, being duly sworn on oath state that the following information is true and that I have personal knowledge of the information contained in this Affidavit.

1. In depositions taken by attorneys in this matter, the company witnesses for Defendant TrueLink, Inc. testified under oath that Defendant TrueLink is owned by TransUnion, LLC ("TU"). TU is the majority owner of Defendant.
2. TransUnion, LLC is a credit reporting agency which maintains or maintained credit information and other information, information reflecting and maintained by recording the Social Security number or other identification information of my husband, Plaintiff Steven

Millett. TU sent my husband, Steven Millett, a letter which indicated that multiple entities were reporting to TU that accounts had been opened with the Social Security number which was actually issued to my husband, Steven Millett.

3. I spent many hours and expended sums of money in order to close over 26 accounts which had been opened fraudulently utilizing my husband's Social Security number.
4. I know that an identity thief reported my husband's Social Security number to his employer. This person purchased the number from a notary public on Soto Street in Los Angeles, California.
5. I told TU that an identity thief was utilizing my husband's Social Security number. TU indicated that it would continue to maintain its records of accounts which were reported to it with my husband's Social Security number.
6. I know of several instances in which TU was aware that an account was not properly attributable to my husband, Steven Millett.
7. In the "credit reports" and in the consumer information statements provided to me by Defendant and its parent, TU, the fraudulent accounts are not listed and have never been listed.
8. Plaintiffs require this information in order to close any credit files

which are reported with Steven Millett's Social Security information.

9. Some credit accounts were reported to TU with my husband's name, address, and Social Security number and these accounts are not and were not shown to us by Defendant, in its "credit reports".
10. Some credit accounts were reported to TU with my husband's name, address, and Social Security number and these accounts are not and were not shown to us by TU, in its consumer information statements.
11. I have expended a great deal of time learning about the credit reporting agencies. In the process of learning about the agencies, and in the process of litigating several matters which had to be filed in an attempt to correct inaccurate credit reporting pertaining to my husband, including this matter, I know that the credit reporting agencies have information in their data bases which is not displayed to a consumer. Such information is excluded from "credit reports" and consumer information statements even though it remains on the data bases of the credit reporting agencies.
12. I have been unable to obtain most of the consumer reports which TU provides or provided to those wishing to extend credit to my husband or to the known identity thief, Abundio Cuautle Perez.
13. Information which is displayed on a consumer report provided to a

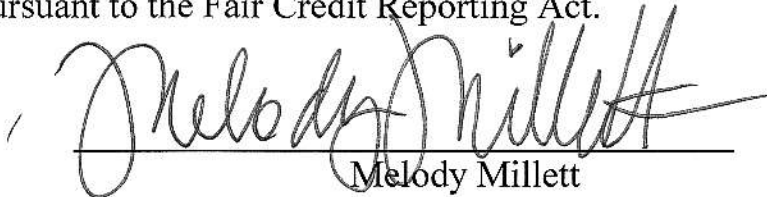
creditor or potential creditor is not the same information which is provided to a consumer on a consumer information statement.

14. Some credit accounts were reported to TU with my husband's name, address, and Social Security number and these accounts are not shown to us by TU, in "credit reports" it provided to Defendant.
15. Some credit accounts were reported to TU with my husband's name, address, and Social Security number and these accounts are not shown to us by TU, in its consumer disclosure statements.
16. One known identity thief, Abundio Cuautle Perez, has obtained employment by reporting my husband's Social Security number to his employer.
17. I have closed over 26 accounts which were opened by Abundio Cuautle Perez. I did so by contacting the credit grantors individually.
18. Based upon documents obtained in litigation with Defendant and others, we learned that Abundio Cuautle Perez now uses another alias, Mauricio Perez.
19. Plaintiff Steven Millett was issued a Social Security number by the Social Security Administration which is being used by this known identity thief as well as by others associated with him.
20. TransUnion, LLC maintains a credit file for Steven Millett which

contains information which is not reflected on a consumer information statement or consumer report, as those terms are defined in the Fair Credit Reporting Act.

21. TransUnion, LLC previously notified Plaintiff Steven Millett in a letter that it would continue to maintain information which reflected or referenced his Social Security number whether or not the credit information maintained was actually correctly attributable to Mr. Millett.

22. TransUnion, LLC previously notified Plaintiff Steven Millett in a letter that it would continue to maintain information in its databases which we disputed pursuant to the Fair Credit Reporting Act.


Melody Millett

The foregoing was subscribed and sworn to before me this 18th day of July, 2007.


Notary Public

My Commission Expires:

9/5/10

